

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: TESTOSTERONE)
REPLACEMENT THERAPY) CASE NO.: MDL NO. 2545
PRODUCTS LIABILITY LITIGATION)

THIS DOCUMENT RELATES TO ALL CASES

**MOTION OF DENNIS G. PANTAZIS FOR APPOINTMENT TO
PLAINTIFFS' STEERING COMMITTEE AND/OR EXECUTIVE COMMITTEE**

The undersigned, Dennis Pantazis, moves for appointment to Plaintiffs' Steering Committee and/or Executive Committee in MDL 2545, *In re: Testosterone Replacement Therapy Products Liability Litigation*.

The most important factor in establishing leadership in any complex litigation is to create a group of outstanding attorneys who are capable of working together effectively. "The just and efficient resolution of this case may depend in large part upon the way the attorneys comport themselves and how they overcome conflicts." *Annotated Manual for Complex Litigation* §10.23 (4th ed. 2009), quoting *Northern Indiana Public Service Co. v. Certain Underwriters at Lloyd's London*, 1996 WL 115466 (N.D. Ind. 1996). Having taken the provisions of the *Manual* to heart and as demonstrated by his prior leadership in similar cases, Dennis Pantazis has been very effective in working in complex litigation to achieve significant results.

As explained herein, in the individual resume of Dennis Pantazis, and in the firm resume of Wiggins Childs Pantazis Fisher Goldfarb ("Wiggins Childs"), which are attached hereto as Exhibits A and B respectively, Mr. Pantazis has significant experience in handling complex class

actions, possesses in-depth knowledge of the applicable law and has adequate resources to commit to representing the plaintiffs. His appointment to Plaintiffs' Steering Committee and/or Executive Committee is both warranted and appropriate.

Mr. Pantazis has already devoted substantial time and resources in investigating the claims on behalf of Plaintiffs who were prescribed and supplied with, received and who have taken and applied the Testosterone drugs that were manufactured and sold by the collective group of defendants named in this multidistrict litigation.

In addition to investigating these cases, Mr. Pantazis and his firm have filed ten (10) Federal court cases against the various defendants named in this litigation across the country¹ and have devoted significant attorney time and resources in pursuing all of these actions. Further, Mr. Pantazis has over 30 years' experience in representing consumers. He has represented clients in complex litigation in major courts across the Country, including the United States Supreme Court. Wiggins Childs has offices in Birmingham and Mobile, Alabama; Washington, DC; DeLand, Florida; and Nashville, Tennessee, and employs an experienced team of attorneys and staff supported by a powerful and efficient infrastructure.

Mr. Pantazis has served in leadership positions on a multitude of cases. A partial list includes the following cases:

- *In re Blue Cross Blue Shield Antitrust Litigation*
(N. D. AL, MDL No. 2406);

¹Mr. Pantazis has filed the following three (3) actions in the Northern District of Illinois: Victor Malabe (Case No. 1:14-cv-05031), Roger Gosnell (Case No. 1:14-cv-05040), and James Ludovicz (Case No. 1:14-cv-05045). In addition, Mr. Pantazis has filed the following seven (7) actions in the Northern District of Alabama and recently filed Notices of Tag-Along for same: Mitchell Sobley (Case No. 2:14-cv-01271-AKK), Benjamin Weathers (Case No. 2:14-cv-01265-KOB), Edward Houston (Case No. 2:14-v-01270-TMP), Warren Wolfe (Case No. 2:14-cv-01264-JHE), James Walker Jr. (Case No. 2:14-cv-01273-RDP), Abner Daniels (Case No. 2:14-cv-01267-AKK), and Charles Marsee (Case No. 2:14-cv-01272-SLB).

- *Rick Love, M.D., et al. v. Blue Cross and Blue Shield Association, et al.* (SD. Fla., Case No. 03-21296-CIV);
- *In re Managed Care Litigation* (S.D. Fla. MDL-2000);
- *In Re: American General Life and Accident Insurance Company - Industrial Life Insurance Litigation* (Dist. of SC, Columbia Div., 2001);
- *In Re: Terrorist Attacks on September 11, 2001* (S.D. NY 2003);
- *In Re: Pharmacy Benefit Managers AntiTrust Litigation* (E.D. PA 2006);
- *In Re: Comcast Corp. Set-Top Cable Television Box Anti-Trust Litigation* (E.D. Pa. 2009);
- *Parsons v. Bright House Networks, Inc.* (N.D. AL, Case No. 2:09-cv-00267-AKK); and
- *In re Riddell Concussion Reduction Litigation* (U.S. District Ct., District of NJ, Case No. 13-7585)

The appointment of Mr. Pantazis to Plaintiffs' Steering Committee and/or Executive Committee is supported by his experience and abilities.

WHEREFORE, I, Dennis Pantazis, respectfully request this Court to appoint me as a member of Plaintiffs' Steering Committee and/or Executive Committee in *In re: Testosterone Replacement Therapy Products Liability Litigation*, MDL No. 2545.

RESPECTFULLY SUBMITTED,

/s/ Dennis G. Pantazis

Dennis G. Pantazis

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